

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

REBECCA MUSSER,

Plaintiff,

v.

PAUL QUINN COLLEGE,

Defendant.

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CIVIL ACTION NO.  
3:17-CV-02166-C

**DEFENDANT PAUL QUINN COLLEGE'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56(b) and Local Rule CV-56, Defendant Paul Quinn College ("PQC" or "Defendant") files this Motion for Summary Judgment on Plaintiff Rebecca Musser's sole claim for retaliation under the federal False Claims Act ("FCA"), 31 U.S.C. § 3729 *et seq.*

In accordance with Local Rule 56.3(b), PQC will comply with Local Rule 56.3(a) by setting forth each of the required matters in Defendant's Brief in Support of its Motion for Summary Judgment. For the reasons stated in its separately filed Brief, Defendant moves for summary judgment on Plaintiff's sole claim.

Wherefore, Defendant respectfully requests the Court grant its Motion for Summary Judgment and award Defendant its costs, reasonable attorneys' fees, and all other relief to which it may be justly entitled.

Respectfully submitted,

**GREENBERG TRAURIG, LLC**

By: /s/ Alicia Sienne Voltmer

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**ATTORNEYS FOR DEFENDANT  
PAUL QUINN COLLEGE**

**CERTIFICATE OF SERVICE**

On September 21, 2018, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Alicia Sienne Voltmer  
Alicia Sienne Voltmer